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MODIFICATION REPORT
MODIFICATION PROPOSAL P103 –
Respecification of Trading Data

Prepared by ELEXON on behalf of the Balancing
and Settlement Code Panel

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c Intellectual Property Rights and Copyright

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d Related Documents

Ref.	Document	Owner	Issue Date	Version
1	P103 – Modification Proposal		7 October 2002	-
2	P103 Initial Written Assessment	ELEXON	10 October 2002	1.0
3	P103 – Assessment Report	ELEXON	10 January 2003	1.0

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1 SUMMARY AND RECOMMENDATIONS

1.1 Recommendation

On the basis of the analysis, consultation and assessment undertaken in respect of this Modification Proposal during the Assessment Phase, and the resultant findings of this report, the Balancing and Settlement Code Panel ('the Panel') recommends that:

Proposed Modification P103 should not be made.

In the event that the Authority determines that the Proposed Modification P103 should be made, AGREE a Calendar Day Implementation Date of:

29 June 2004 if an Authority decision is received from the Authority prior to 20 June 2003; or

2 November 2004 if an Authority decision is received on or after 20 June 2003 and prior to 24 October 2003.

1.2 Background

Modification Proposal P103 'Respecification of Trading Data' (P103) (Reference 1), was raised by Slough Energy Supplies Ltd on 7 October 2002.

P103 proposes to extend the functionality provided by the Balancing Mechanism Reporting Agent (BMRA) in relation to the Balancing Mechanism Reporting Service (BMRS). In particular, P103 seeks to extend both the content and retention period for information currently provided on the BMRS as well as providing additional tools to allow users to query the data. Such tools as those referred to within the Modification Proposal, include interfaces to products such as Microsoft® Access® to enable manipulation of the data in a more user friendly and transparent manner. The Proposed Modification seeks to introduce a new interface between the BMRA and the Settlement Administration Agent (SAA). This new interface is required to ensure that Indicative data items displayed on the BMRS, such as Indicative Energy Imbalance Prices, are replaced with the actual data used within Settlement following each Settlement Run carried out in accordance with the Settlement Calendar defined within Section U2 of the Code.

1.3 Rationale for Recommendations

[Section to be completed following Panel Meeting on 13 March 2003.]

The majority of the Panel agreed with the rationale and majority recommendation of the Settlement Standing Modification Group (SSMG). The Panel agreed that the increased transparency brought about by the provision of information to all BSC Parties would in turn bring about an increase in competition in the generation and supply of electricity. This would therefore better facilitate Applicable BSC Objective (c).

The Panel noted the view of the SSMG and agreed by majority with the rationale expressed by the SSMG within the P103 Assessment Report. In particular that

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the efficiency of the administration of the Code would not be increased (Applicable BSC Objective (d)).

During the Assessment Procedure for P103, a consultation was undertaken which specifically requested views on whether the Proposed Modification P103 better facilitated the Applicable BSC Objectives. The Panel supported the majority view of the SSMG that the data requested within P103 was already available to those BSC Parties who chose to receive it. In particular the Panel felt that central development of IT Systems that sought to mirror developments that Parties may have already undertaken did not introduce efficiency into the Balancing and Settlement Code Procedures.

The majority of the Panel agreed with the view of the SSMG that the inefficiencies introduced by P103 outweighed the benefit arising as a result of increased competition in the generation and supply of electricity.

XX responses to the draft Modification Report consultation were received. XX responses (XX Parties, XX Non Parties) supported the Panel's recommendations and XX responses (XX Parties, XX Non Parties) did not support the Panel's recommendations.

XXX/No new issues were raised in the consultation responses. A summary of the responses received is given in section XX.]

2 INTRODUCTION

This Report has been prepared by ELEXON Ltd., on behalf of the Balancing and Settlement Code Panel ('the Panel'), in accordance with the terms of the Balancing and Settlement Code ('Code'). The Code is the legal document containing the rules of the balancing mechanism and imbalance settlement process and related governance provisions. ELEXON is the company that performs the role and functions of the BSCCo, as defined in the Code.

This Modification Report is addressed and furnished to the Gas and Electricity Markets Authority ('the Authority') and none of the facts, opinions or statements contained herein may be relied upon by any other person.

An electronic copy of this document can be found on the BSC Website, at www.elexon.co.uk

3 HISTORY OF PROPOSED MODIFICATION

The Panel, at its meeting of 17 October 2002, considered the Initial Written Assessment for P103 (Reference 2). The Panel agreed to submit P103 to the Assessment Procedure to be conducted by the SSMG and further agreed that an Assessment Report should be presented to the Panel at their meeting on 16 January 2002.

During the Assessment Procedure the SSMG met on four occasions and developed a Requirements Specification (Reference 3). The Requirements Specification outlined the key changes that would be required to the BSC Systems in order to implement P103. This Requirements Specification was issued for consultation on 20 November 2002 allowing 10 Working Days for consultation responses to be received. The Assessment Procedure consultation sought respondent's views in respect to a number of specific issues identified by the SSMG.

In parallel with the consultation, a request for a Detailed Level Impact Assessment from Parties and BSC Agents was also issued. Therefore, at the time of returning the Assessment Procedure consultation responses, respondents would have been unaware of the potential costs of developing the changes to BSC Systems. The SSMG therefore requested views from respondents on the principle of providing such service centrally, together with an indication of how the views of respondents might change depending on the costs of implementing P103.

The P103 Assessment Procedure consultation received a total of **14** responses (**54** Parties and **5** non-Parties). The majority of respondents supporting the view that P103 did not better facilitate the achievement of the Applicable BSC Objectives.

At their meeting on 16 January 2003, the Panel received the P103 Assessment Report (Reference 4). The majority of the Panel agreed with the views of the SSMG and submitted P103 to the Report Phase with a recommendation that the Proposed Modification should not be made. A detailed exposition of the views and rationale of the Panel in making its recommendation to the Authority can be found in Section 5 of this Modification Report.

As the majority of the SSMG believed that P103 did not, on balance, better facilitate the achievement of the Applicable BSC Objectives, no legal text was commissioned during the Assessment Procedure. In accordance with paragraph F2.7 of the Code, the Panel sought confirmation from the Authority as to whether the legal text was required to be presented as part of the draft Modification Report. Subsequent to the Panel meeting, the Authority confirmed that legal text should be commissioned and presented within the draft Modification Report.

The legal text was prepared by ELEXON and distributed to, and agreed by, the SSMG for review prior to the consultation on the draft Modification Report.

4 DESCRIPTION OF PROPOSED MODIFICATION

4.1 The Proposed Modification

4.1.1 Overview of Proposed Modification

P103 seeks to make a number of changes to the content and availability of data displayed on the BMRS Low Grade Service. In particular, P103 suggests that:

- a) Indicative data, currently displayed on the BMRS, should be replaced, and subsequently updated, to show the actual values calculated by the SAA following each Settlement Runs;
- b) The data retention period for data displayed on the BMRS should be increased from the current 12 months from the publication of Indicative data, to 12 months after publication of any updates to such data;
- c) Tools should be provided to allow users to perform simple queries on data held on-line, for example to obtain daily averages / totals by company. The exact specification for such tools will be developed as part of any implementation project for P103 and will be included as part of a revised BMRS Specification;
- d) Users of the BMRS should be allowed to retrieve data for multiple Balancing Mechanism Units (BMUs) and/or data for multiple Settlement Days;

P103 also proposed that the following additional data items be displayed on the BMRS:

- a) Half Hourly Transmission Loss Multiplier Data;
- b) Half Hourly Residual Cashflow value in £/MWh (Referred to within the legal text as the Residual Cashflow Price);
- c) Half Hourly metered output by BM Unit;
- d) Net imbalance position by Party account;
- e) Net Imbalance Volume;
- f) Providing identifiers to accepted Balancing Mechanism trades that are arbitrage trades; and
- g) Identifiers for each bid, offer and acceptances which have been tagged as, included in, or excluded from the Energy Imbalance Price calculations.

For the purposes of undertaking a consultation during the Assessment Procedure the Proposed Modification was split into four requirements:

- Requirement 1: Updating data following each Settlement Run;
- Requirement 2: Data retention, archiving and retrieval;
- Requirement 3: Additional data querying facilities; and
- Requirement 4: Additional data requirements.

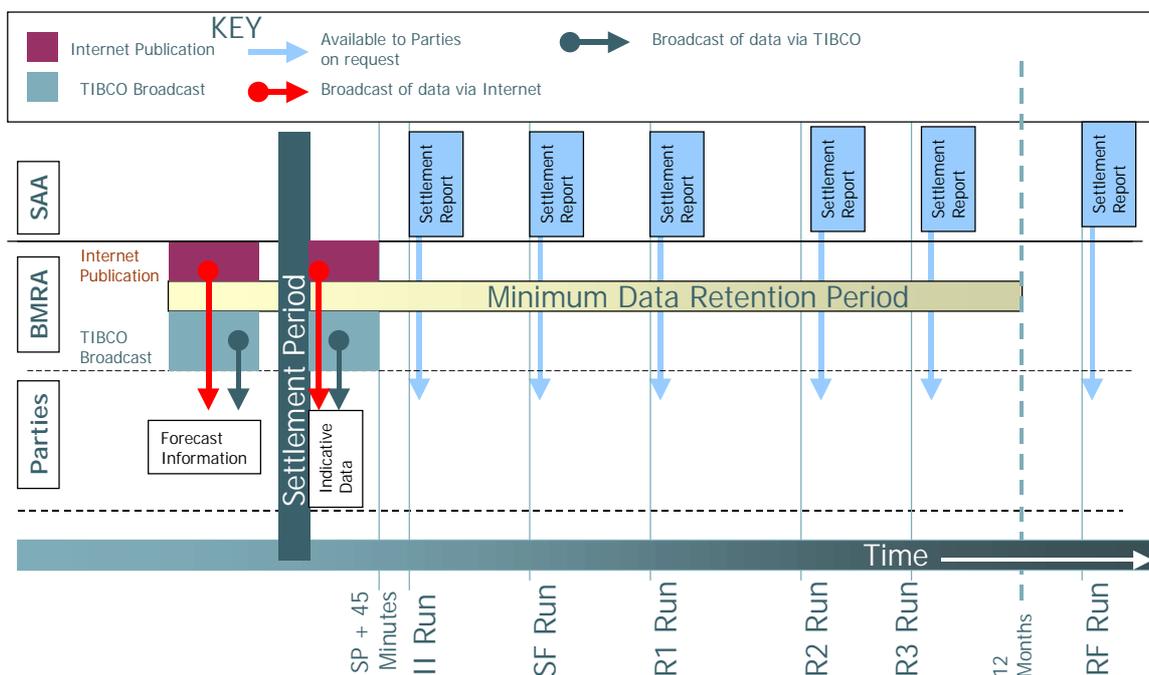
The remainder of this section 4.1 provides further detail on these requirements

4.1.2 Requirement 1: Updating Data Following Each Settlement Run

Figure 1 illustrates the current reporting regime in relation to forecast data, passed to the BMRA in accordance with Section V of the Code.

Figure 1 shows time progressing from left to right. The time period shown starts on the day immediately prior to a Settlement Period, through the relevant Settlement Period and Settlement Runs (Interim Information (II), Initial Settlement Run (SF) First Reconciliation Run (R1), through to the Final Reconciliation Run (RF)). Activities associated with Parties, the BMRA or SAA are identified and shown to the right of the box identifying the relevant Party or BSC Agent. The various Settlement Runs are shown as vertical lines as time progresses.

Figure 1 – Illustration of the current reporting with respect to the BMRA and SAA



The figure illustrates the forecast data published by the BMRA at the day ahead stage, on both the High Grade Service via the TIBCO software interface, and on the Low Grade Service web site (www.bmreports.com).

BSC Parties choose either to have the relevant data items transmitted to them over the High Grade Service, or they interrogate the Low Grade Service to retrieve individual data items they require on an ad hoc basis. Use of the High Grade Service is available to both BSC Parties and Non Parties and allows recipients to store the raw data provided by the BMRA relatively easily within their own IT systems. It should be noted that any person with an Internet browser can view the data currently provided on the BMRS Low Grade Service¹.

The figure shows that within 45 minutes² of the end of any Settlement Period, Indicative data, as calculated by the BMRA, is made available to BSC Parties using both mechanisms described above (i.e. using the Low Grade Service and High Grade Service via Internet publication and Broadcasting using TIBCO software respectively). The diagram also shows that this BMRA data must be retained for a 12-month period³ from the date it is published.

In practice data has been retained for longer than the minimum period and at the time of writing this report, no data has been removed from the BMRS because it is older than the minimum data retention period. Following the publication of Indicative data for a Settlement Period, the BMRA does not update this data following each subsequent Settlement Run.

Following each Settlement Run, BSC Parties can also receive copies of the System Operator variant of the Settlement Report SAA-I014: Settlement Report, sub-flow 2 (S0142) in

¹ References throughout this document relating to BMRS Low Grade Service and BMRS Internet web site refer to www.bmreports.com

² As defined in paragraph V2.3.3

³ As defined in paragraph V2.2.4

addition to the variant of the report that applies only to those BSC Parties. Following the Implementation of Change Proposal CP712, "Transmission Company Sub-flow SAA-I014 Availability", in December 2002 the SAA-I014: Settlement Report, sub-flow 2 (S0142) was made available to Parties via the BMRS High Grade and BMRS Low Grade Services for a seven-day period. In addition, ELEXON currently publish a "Best View" price for each Settlement Period on the BSC Website (www.elexon.co.uk)⁴.

Updating data following subsequent Settlement Runs

The requirement identified within P103 states that the data should be updated following each subsequent "Reconciliation Run". However, the SSMG agreed that this should apply to all Settlement Runs undertaken and not be confined to Reconciliation Runs.

The requirement to update data on the BMRS in line with all Settlement Runs would enable BSC Parties and non Parties to access data that is not currently available on the BMRS. It should be noted as stated above, that this data is already available to all BSC Parties from the SAA in the form of the SAA-I014: Settlement Report, sub-flow 2 (S0142). The Proposer of P103 argues that an obligation to publish the latest available data should be placed on the BMRA.

The SSMG agreed that the Indicative data displayed on the BMRS should be replaced at the Interim Information Run and subsequently be updated by being overwritten at each subsequent Settlement Run.

Figure 2 shows how the distribution of data, as shown in Figure 1, might change if data were to be replaced following the Interim Information Run as a result of P103 being implemented. Figure 3 shows this data then being updated at each subsequent Settlement Run. The Figures also show the new interface required between the SAA and BMRA to receive the Settlement Report (SAA-I014: Settlement Report, sub-flow 2 (S0142)).

In order to implement P103 it was suggested by the SSMG that the BMRA should not be obliged to calculate the new values for the relevant data items but should instead report data that is passed to it by the SAA.

The transmission of the Settlement Report (SAA-I014: Settlement Report, sub-flow 2 (S0142)) from the SAA to the BMRA and the subsequent publication of the relevant data items on the BMRS. The Settlement Report (System Operator variant) contains the necessary data items that are to be updated in accordance with the Settlement Run timetable and required to be displayed on the BMRS.

The Figures show that for a given Settlement Period/Day, data previously available on the BMRS (i.e. indicative or forecast data) that has been updated is no longer available (represented by an 'X'). This approach to updating data means that only the latest available information would ever be displayed on the BMRS.

⁴ During assessment of P103, it was noted that there exists no formal obligation to publish this data.

Figure 2 – Update of BMRA data in line with Interim Information Run – Approach 1

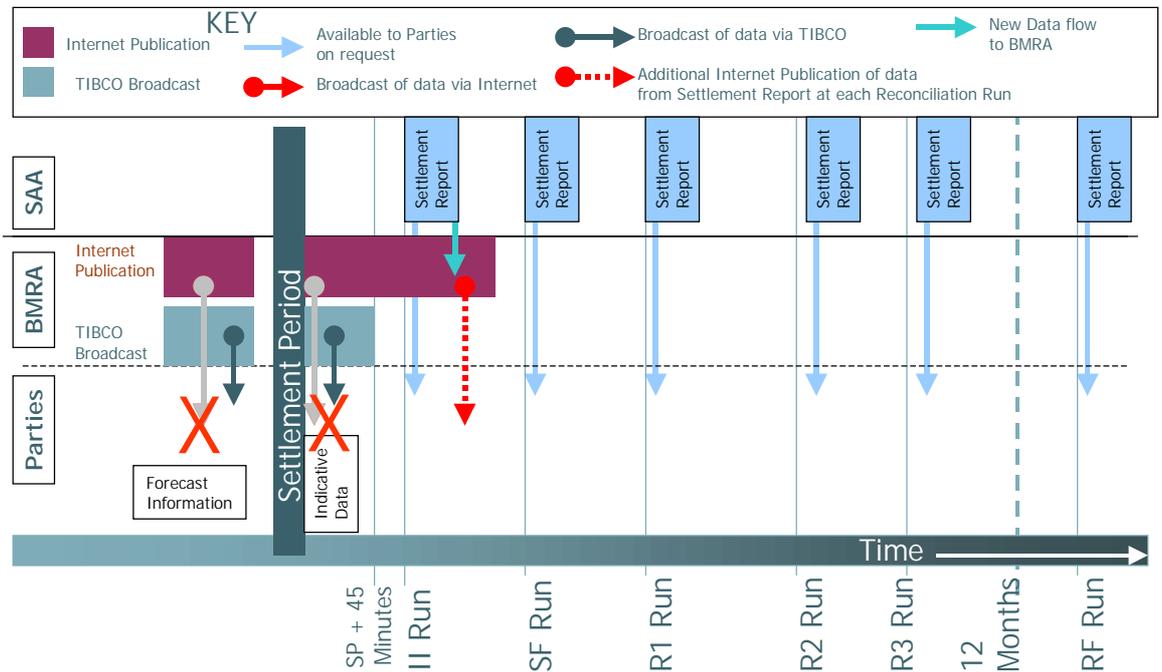
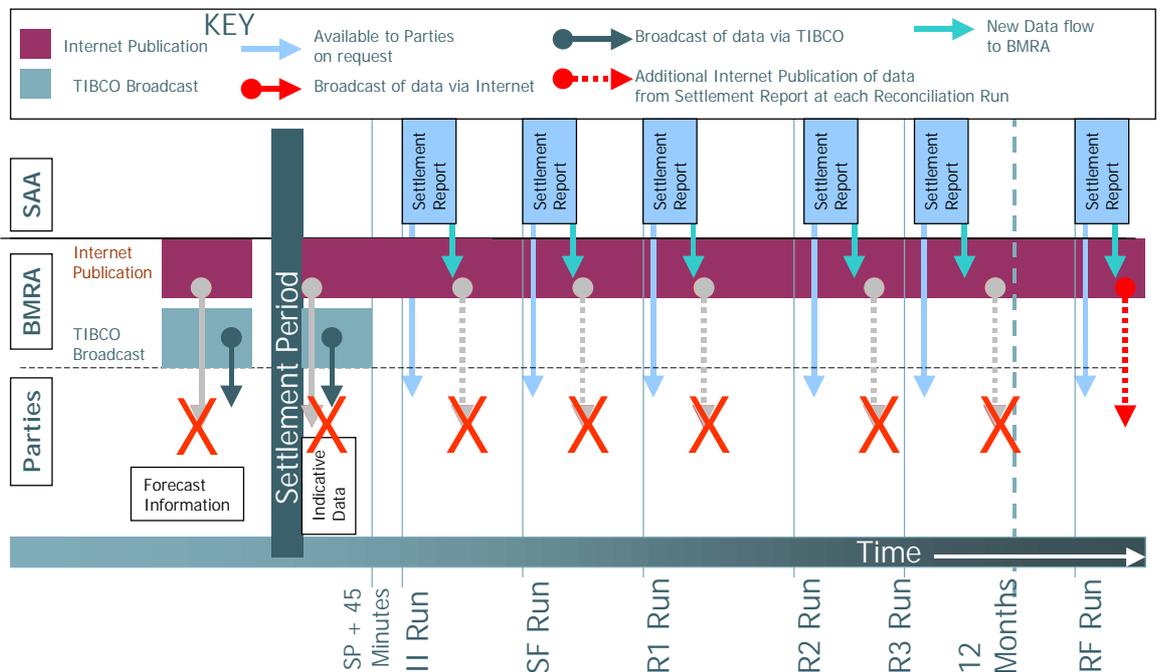


Figure 3 Updates to data carried out at each Settlement Run – Approach 1



The BMRA is currently required to calculate, store and publish on-line, derived values for each Settlement Period within 45 minutes from the end of the Settlement Period. The SSMG agreed that the data listed below should be updated following the completion of each Settlement Run:

- a) Indicative Accepted Offer Volume

- b) Indicative Accepted Bid Volume
- c) Indicative Period BM Unit Total Accepted Offer Volume
- d) Indicative Period BM Unit Total Accepted Bid Volume
- e) Indicative Period BM Unit Offer Cashflow
- f) Indicative Period BM Unit Bid Cashflow
- g) Indicative System Total Accepted Offer Volume
- h) Indicative System Total Accepted Bid Volume
- i) Indicative System Total Un-priced Accepted Offer Volume
- j) Indicative System Total Un-priced Accepted Bid Volume
- k) Indicative Total Accepted Priced Offer Volume
- l) Indicative Total Accepted Priced Bid Volume
- m) Indicative System Buy Price
- n) Indicative System Sell Price

The SSMG agreed that, in the case of updating data on the BMRS in accordance with the relevant Settlement Runs, such data should be displayed within one working day of the receipt of the data from the SAA.

4.1.3 Requirement 2 – Data Retention, Archiving and Retrieval

Requirement 2 relates to the data retention period for data published on the Low Grade BMRS. The proposal originally suggested that a solution be developed to deal with the archiving and subsequent retrieval of such data.

P103 suggested that the current data retention period of 12 months from publication of the data, as specified in Section V of the Code and within the BMRS User Requirements Specification (URS), be extended.

Figure 4 provides a simplified representation of figures 1 - 3, showing an extended time period, and has been modified to show the data retention periods for both forecast data and Indicative data as updated by subsequent Settlement Runs.

The Figure shows the data retention period to be adopted by the BMRA, were the current limit of 12 months to be used for the period beyond the Final Reconciliation Run. The key and format of the diagrams remains the same as figures 1 - 4.

Figure 5 – Proposed extension to Data Retention Period and Archiving Requirements

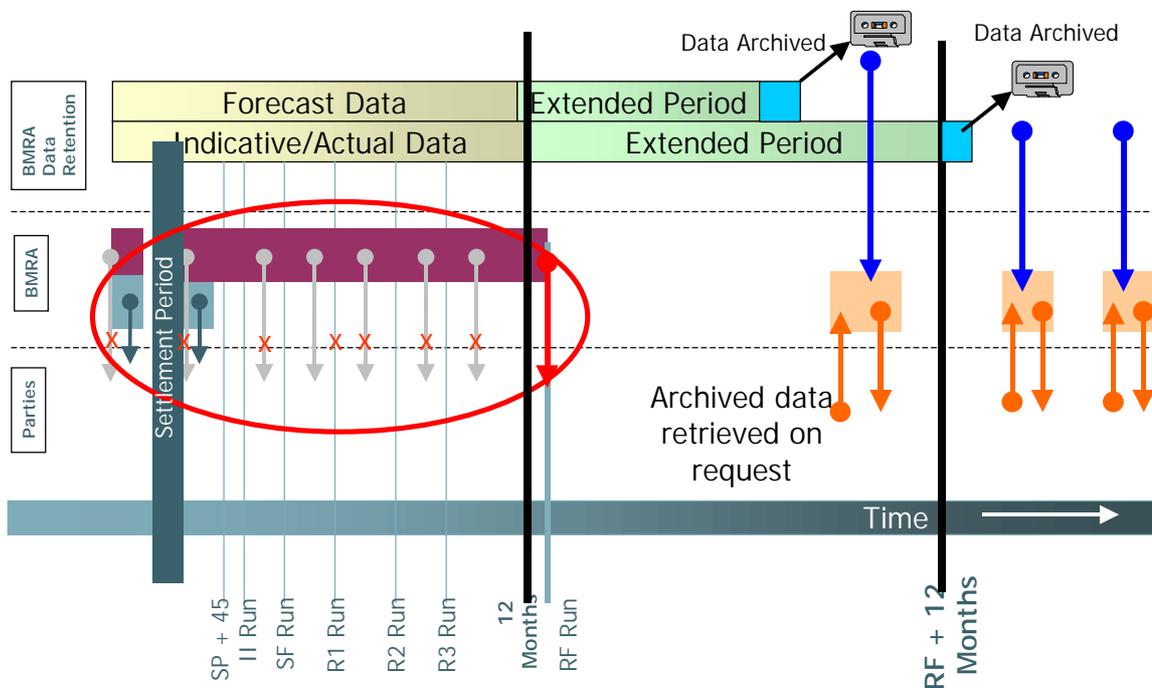


Figure 5 shows the existing principle of data being retained for 12 months after the publication date on the BMRS for Forecast Data, or 12 months after the Settlement Day, for other Indicative data, whilst the green bars represent an extended retention period over that which currently exists. Following the extended data retention period it was proposed that the data be archived and made available to on request to Parties.

The SSMG agreed that data should be retained on the BMRS for 12 months after publication of that data.

If Requirement 1, as outlined within this document were to be implemented, it could be argued that it would not be worthwhile unless the period of time that data was available was sufficient to allow comparisons of data to be made throughout the Settlement Run timetable. This requirement may be seen to allow any parties (whether BSC Signatories or not) who have chosen not to use the High Grade Service, access to information which could be used in the negotiation and management of contracts with counter-parties. It should be noted that access to the High Grade Service is available to all Parties, although the Proposer of P103 suggests that there may be financial reasons or resource issues why some Parties have not taken up the option of using this service.

4.1.4 Requirement 3: Additional Data Querying Facilities

Requirement 3 relates to the additional tools that are made available to users of the BMRS to allow more flexible access to the data displayed on the BMRS.

P103 suggests that additional tools (created from say, Microsoft® Access®) should be provided to allow users to perform simple queries against the data held on the BMRS.

Examples of the queries provided by the Proposer of P103 include the downloading of daily averages or totals, totals by company etc.

Given that the data published by the BMRA must be made available within the timescales provided within the Code, (for example the requirement to publish Indicative data within 45 minutes of the end of a Settlement Period), the SSMG concluded that it may be appropriate that a secondary data repository be set up that allows users to undertake such queries. The exact specification of such tools will be developed following any approval of P103.

Access to data over multiple BM Units or Settlement Days.

P103 proposes that users of the BMRS are allowed to retrieve data for multiple BMUs and/or multiple Settlement Days.

4.1.5 Requirement 4: Additional Data Requirements

P103 specifically identifies the following additional data items for display on the BMRS:

- a) Half Hourly Transmission Loss Multiplier Data;
- b) Half Hourly metered quantities by BM Unit;
- c) Net imbalance position by Party account; and
- d) Net Imbalance Volume (NIV as introduced by P78).

Items a) to c) above are currently provided within the System Operator variant of the Settlement Report. P103 also requests further information to be provided which is not provided as specified within the System Operator variant of the Settlement Report. Specifically:

- a) Half Hourly Residual Cashflow value in £/MWh;
- b) Providing identifiers to accepted BM Trades that are arbitrage trades;
- c) Identifiers for each bid, offer and acceptances that have been tagged as included in or excluded from the Energy Imbalance Price calculations.

With respect to the provision of additional identifiers, the SSMG assumed that in order to avoid further processing by the BMRA, this additional data could be made available from the SAA following each Settlement Run. The SSMG suggested that this could be implemented by the introduction of relevant changes to the Settlement Report.

The identification of identifiers for arbitrage trades and bid, offer and acceptances could theoretically be produced by the BMRA during the calculation of Indicative data, shortly after the completion of the Settlement Period. However, this would however force the BMRA to increase its processing capacity and possibly affect the ability to publish data in a timely manner for the recent Settlement Periods.

A solution to this would be for the SAA to produce the tagging information when the Energy Imbalance Prices are calculated in accordance with the Settlement Runs. This data could then be passed to the BMRA prior to its publication on the BMRS.

5 RATIONALE FOR PANEL RECOMMENDATIONS

At their meeting on 16 January 2003, the Panel discussed the contents of the P103 Assessment Report. The SSMG had argued in their Assessment Report that P103 would introduce greater competition within the generation and supply of electricity (Applicable BSC Objective (c)). The SSMG had also considered that P103 introduced the duplication of data held by different BSC Agents (the SAA and BMRA), duplication of systems and processes that may have been already developed by Parties, and the fact that few Parties indicated the service would be used by them. Taking these factors into account the SSMG believed that P103 would therefore decrease the efficiency in the implementation and administration of the balancing and settlement arrangements (Applicable BSC Objective (d)). The SSMG had stated that, on balance, the Applicable BSC Objectives would not be better facilitated by the introduction of P103 as the inefficiencies introduced by P103 far outweighed the benefits from increased competition. The SSMG had also wished to draw to the attention of the Panel the significant costs that would have to be paid by Parties were P103 to be implemented.

In discussing the Assessment Report, a Panel member questioned whether a process existed by which costs presented by the BSC Agent are challenged. ELEXON confirmed that all Impact BSC Agent Impact Assessments go through both a Technical and Commercial review, where appropriate this will result in a challenge until all details, technical and commercial, are fully understood, P103 was no exception. ELEXON also pointed out that since the receipt of the BSC Agent Impact Assessment, the SSMG had refined the Proposed Modification to define the duration of any extended data retention period. The SSMG confirmed that the extended data retention period would only be 12 months after the publication of data related to a Settlement Period. The conclusion that may therefore be drawn from this is that the costs attributable to purchasing additional storage media (approximately £132,000) would not be a required for each year of operation and may tail off after the initial year of operation.

A Panel member queried why the SSMG had not developed an Alternative Modification that was cheaper than the current solution. ELEXON advised the Panel that the Assessment Procedure consultation had been responded to by Parties on the principles involved in P103 without the benefit of having the costs from the BSC Agent available to them. The majority of the responses by Parties to the consultation did not believe the Applicable BSC Objectives would be better facilitated by the introduction of P103. It was also noted that a specific question had been asked in the consultation about whether respondents' views might change depending on the development and implementation costs for P103. The majority of the responses to this question within the Assessment Procedure consultation had specified that they did not support the Modification Proposal even if it had a zero cost. Taking this into account, together with their view on whether the Applicable BSC Objectives could be better facilitated, the SSMG had determined not to develop an Alternative Modification.

Another Panel member suggested that the relevant Standing Modification Group should look at the issue of transparency of information for market participants. It was observed however that this was something that could be undertaken but it did rely on a Party raising an issue for discussion by the relevant group.

The Panel considered the strengths of the arguments detailed within the P103 Assessment Report and voted by majority that they agreed with the rationale of the SSMG and that the Proposed Modification P103 should not be made.

6 LEGAL TEXT TO GIVE EFFECT TO THE PROPOSED MODIFICATION

6.1 Conformed Version

A Redlined version of the legal text is provided in Annex 1.

7 ASSESSMENT

Details of the Assessment of P103 can be found within the P103 Assessment Report. A summary of the SSMG's assessment of P103 against whether P103 better facilitated the achievement of the Applicable BSC Objectives is contained below.

At their meeting on 10 December 2002 and again at their meeting on 7 January 2003, the SSMG considered whether P103 better facilitated the achievement of the Applicable BSC Objectives. The SSMG considered the views of the consultation respondents.

The views of the majority of the SSMG were that:

- a) The BMRS was not designed as a tool to report prices used within Settlement. The view of the SSMG was that such information was available to BSC Parties within the Settlement Report;
- b) The Indicative data reported on the BMRS is displayed both graphically and, in a number of cases, in Comma Separated Value (CSV) format. This provides the ability to view the data or retrieve it for use within Parties' information systems;
- c) Parties were encouraged to develop their own market monitoring systems at Go-Live for the New Electricity Trading Arrangements (NETA). The investment already made by Parties in developing those market monitoring systems would have been made in vain with further investment being required to fund a centrally developed enhanced reporting system;
- d) The availability of such information as that provided by P103 could lead to an increase in competition of Generation and Supply of electricity and therefore P103 could better facilitate Applicable BSC Objective (c);
- e) The SSMG were unanimous in expressing strong concern about the very high level of costs provided by the relevant BSC Agents in their response to the Detailed Level Impact Assessment. Taking into account these substantial costs and the fact that inefficiencies would be introduced by P103 as Parties had already developed their own systems for storing this information the majority of the SSMG believed that P103 would not introduce efficiency increased efficiency. The majority of the SSMG believed that were a Party to require such information it was could be retrieved using the High Grade BMRS. The SSMG therefore believed that the introduction of P103 would not better facilitate the achievement of Applicable BSC Objective (d);
- f) In weighing up the different views with respect to each of the Applicable BSC Objectives, that although the achievement of Applicable BSC Objective (c) may be better facilitated, this would be far outweighed by the lack of achievement of Applicable BSC Objective (d) for the reasons presented above.

A view, held by one member, was that the proposal would not better meet BSC objective (c) as it would amount to subsidising new entry. This was because existing participants would be paying for data manipulation and analysis tools to be provided to entrants free of charge, whilst they had been required to procure their own facilities at significant cost. The same member observed that the ability to manipulate and analyse data better than your competitors was a legitimate source of competitor advantage and this would be undermined by the proposal. The member that held this view felt Applicable BSC Objective (c) would be better facilitated by a different Modification Proposal, such as P114, that made access to raw data more widely available. Therefore in their opinion market based

solutions could develop to allow third parties to carry out data analysis on behalf of those participants who did not have the resources to do so themselves.

Other arguments expressed by individual members of the SSMG were:

- a) At present, the BMRS data is misleading as it is generally out of date in that it displays Indicative data and not the latest available values for such data.
- b) There exists no formal obligation on BSCCo to publish or guarantee the accuracy of its "Best View Prices" spreadsheet. The BMRS was created in order to provide non Parties as well as smaller Parties with data in a form intended to be useable by parties who are unable to utilise the raw data available in the high grade service. The BMRS is not developed to the point of meeting that need effectively and that the current situation is therefore contrary to Applicable BSC objectives.
- c) The lack of the information places Licensed Exempt Generators (LEGs) under an undue disadvantage relative to larger Parties, who, in their opinion, often have the resources to access and process the relevant data themselves. These services should be available to those parties who did not have the resources to have made such investment at "Go-Live". They are an integral part of the market structure and should therefore be regarded as "unfinished business" from the introduction of the NETA.
- d) P103 would not have any adverse effect on Applicable BSC Objective (d) and that P103 would better facilitate the achievement of Applicable BSC objective (c) and therefore the modification should be implemented.

All views expressed were fully considered by the SSMG in making their majority recommendation that P103 should not be made.

8 SUMMARY OF REPRESENTATIONS

[A summary of responses to consultation on Draft Modification Report will be inserted here. Copies of the actual responses will be inserted as Annex 2.]

[A summary and copies of the original representations received and considered by the Modification Group under the initial consultation on this proposal can be found in the Assessment Report on this proposal. This Modification Report should be read in conjunction with that Assessment Report.]

ANNEX 1 – LEGAL DRAFTING

The legal drafting for P103 is attached as two separate documents. The first document represents the changes required to Section V whilst the second details changes to the Annexes of Section X. It should be noted that the legal text was drafted prior to the Implementation of the P78 Proposed Modification, however any P78 changes forming part of the legal baseline have been included within the text.

ANNEX 2 – REPRESENTATIONS

[Copies of representations on Draft Modification Report will be inserted as Annex 2]